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MAY CHIANG

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July 9, 2024

VIA ECF

Honorable Paul A. Engelmayer Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re:

Jane Street Group LLC v. Millennium Management LLC, 24 C 2783 (PAE), LETTER MOTION TO SEAL MILLENNIUM'S OPPOSITION TO JANE

STREET'S MOTION TO DISMISS AMENDED COUNTERCLAIMS

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC ("Millennium") in the above-referenced action. We write to request permission to seal certain materials that potentially contain the parties' confidential, proprietary, commercially sensitive, or trade secret information. Millennium files its Opposition to Jane Street's Motion to Dismiss Millennium's Amended Counterclaims (D.I. 139) and seeks to seal its filing consistent with the Court's prior Orders granting sealing of Millennium's Initial and Amended Answers and Counterclaims (D.I. 75, D.I. 110, D.I. 123) and also pursuant to the parties' agreement described below.

The parties have agreed that if any party is filing any document that might possibly reveal or reflect information that the non-filing party may seek to redact (including information that is protected under the Confidentiality Order), the filing party will initially file the document completely under seal. The parties will then confer within two business days on whether any part of the filing should remain under seal, if the filing can be made publicly, or if any redactions are requested. The original filing party agrees to honor all such proposed redactions in the public redacted filing, without prejudice to the right to dispute any proposed redactions in accordance with the Court's procedures.

Millennium therefore respectfully requests permission to file its Opposition to Jane Street's Motion to Dismiss Millennium's Amended Counterclaims under seal.

Respectfully submitted,

GRANTED.

/s/ May Chiang

SO ORDERED.

May Chiang

cc:

PAUL A. ENGELMAYER

Deborah Brown, Quinn Emanuel, by ECF

United States District Judge

Rollo Baker, Elsberg Baker & Maruri, by ECF

Dated: July 10, 2024 New York, New York